

1 LYSSA S. ANDERSON
Nevada Bar No. 5781
2 KRISTOPHER J. KALKOWSKI
Nevada Bar No. 14892
3 KAEMPFER CROWELL
1980 Festival Plaza Drive, Suite 650
4 Las Vegas, Nevada 89135
Telephone: (702) 792-7000
5 Fax: (702) 796-7181
landerson@kcnvlaw.com
6 kkalkowski@kcnvlaw.com

7 *Attorneys for Defendants*
City of Henderson and Jackie Gonzalez

8
9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 Michelle Greybill, as Administrator of the
Estate of John Greybill,

12 Plaintiff,

13 vs.

14 Naphcare, Inc.; City of Henderson; Vernon
Maniago; Mandana Ziaei-Ghafouri; Ivy Rose
Volonte; Ebony Michelle Garner; Brittany
15 Reyes; Sheldon Chase; Selma Tabakovic;
Sheena Carnate; and Jackie Gonzalez,

16 Defendants.
17

Case No.: 2:24-cv-01276-CDS-EJY

**STIPULATION TO EXTEND TIME FOR
HENDERSON DEFENDANTS TO FILE
RESPONSE TO PLAINTIFF'S MOTION
TO COMPEL AN ESI PROTOCOL
[ECF No. 54]**

18 Pursuant to Local Rule 6-1, Michelle Greybill, individually and as Special Administrator
19 of the Estate of John Greybill ("Plaintiffs"), City of Henderson and Jackie Gonzalez ("Henderson
20 Defendants"), and NaphCare, Inc.; Vernon Maniago; Mandana Ziaei-Ghafouri; Ivy Rose
21 Volonte; Ebony Michelle Garner; Brittany Reyes; Sheldon Chase; Selma Tabakovic; and Sheena
22 Carnate ("NaphCare Defendants"), stipulate, agree, and request that the Court extend the
23 deadline for the Henderson Defendants to file their Response to the pending Motion to Compel
24 Entry of an ESI Protocol, (ECF No. 54), from the current date of Friday, August 8, 2025, to

Tuesday, August 12, 2025. The parties agree that good cause exists for a brief extension of the briefing schedule because Plaintiff's counsel has indicated that they intend to clarify the Motion (ECF No. 54). This clarification is anticipated to obviate the Henderson Defendants' need to respond to the Motion, or to allow a response to the issues raised. The brief extension will not prejudice any parties.

DATED this 8th day of August, 2025.

By: /s/ Kristopher J. Kalkowski
 Lyssa S. Anderson
 Kristopher J. Kalkowski
 KAEMPFER CROWELL
 1980 Festival Plaza Drive, Suite 650
 Las Vegas, Nevada 89135
*Attorneys for Henderson
 Defendants*

DATED this 8th day of August, 2025.

By: /s/ Chad C. Couchot
 Chad C. Couchot, Esq.
 SCHUERING ZIMMERMAN &
 DOYLE
 400 University Avenue
 Sacramento, CA 95825
 -and-
 Aimee Clark Newberry, Esq.
 CLARK NEWBERRY LAW FIRM
 410 S. Rampart Blvd., Ste. 390 #308
 Las Vegas, NV 89145

Attorneys for NaphCare Defendants

DATED this 8th day of August, 2025.

By: /s/ Annie Prossnitz
 Sarah Grady
 Terah Tollner
 Adam J. Smith
 Matthew Underwood
 Annie Prossnitz
 KAPLAN & GRADY
 2071 N. Southport Ave., Ste. 205
 Chicago, IL 60614
 -and-
 Erica C. Medley
 HOLLAND & HART
 9555 Hillwood Dr., 2nd Floor
 Las Vegas, NV 89134

Attorneys for Plaintiff

IT IS SO ORDERED.

DATED this 11th day of August, 2025.


 UNITED STATES MAGISTRATE JUDGE